

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: MICHAEL ALLEN CROTSLEY
ERIK A ANN CROTSLEY : CHAPTER 13
:
:
DEBTORS : 15-11052

CHAPTER 13 PLAN PRE-CONFIRMATION

1. The future earnings of the debtor are submitted to the supervision and control of the Trustee and the Debtors, **MICHAEL and ERIKA CROTSLEY**, shall pay to the trustee the total sum of **\$168.18** to be paid in monthly installments of **\$10,090.65** for the 1st through 60 months of the Plan.

The Plan's applicable commitment period is five (5) years.

2. From the payments so received, the Trustee shall make disbursements as follows:

Frederick L. Reigle, Esquire, Standing Chapter 13 Trustee in
the amount as set forth by the United States Trustee's
Office.

- a) Administrative Expenses:

- 1) All administrative expenses as follows:

Thomas L. Lightner, Esq.	\$1,000.00
--------------------------	------------

- b) Priority Claims as follows:

Commonwealth of PA (Unemployment)	\$6,699.00
-----------------------------------	------------

Internal Revenue Service-2012 Taxes	\$1,685.30
-------------------------------------	------------

- c) ARREARS on Secured Claims as follows:

N/A

- d) The total secured balance due on secured claims including the applicable interest, late fees and costs as follows:

Chase holds a second mortgage on Debtor's real property located at 1773 Meadows Road, Hellertown, PA 18055 with estimated claim that exceeds the value of the Debtor's property after deduction of the first mortgage balance.

**Debtor intends to file a Motion to Determine Secured Status
against Chase.**

e) After all secured and priority claims have been paid,
all allowed unsecured claims shall receive a pro-rata
share of the distribution.

3. The following executory contracts of the Debtors are
rejected:

N/A

4. Unless otherwise stated in this Plan, Debtors shall continue
and/or resume making normal monthly payments to the following
creditors outside the Plan as follows:

Commence/continue normal monthly payments outside the
Plan to:

- a. Citi Mortgage, Inc. - First Mortgage Payment
- b. Ally Financial - 2007 Ford Vehicle Payment
- c. Capital One Auto Finance - 2010 Kawaski Mule
- d. TD Bank - 2007 Mazda Vehicle Payment

5. Debtors exercise his right to avoid all liens as allowed by
law under 11 U.S.C. Section 522(f).
6. Title to the Debtor's property shall revert in the Debtor on
confirmation of plan - upon dismissal of the case after
confirmation pursuant to 11 U.S.C. Section 350.

Dated: 2/16/2015 /s/Michael Allen Crotsley
Michael Allen Crotsley

Dated: 2/16/2015 /s/Erika Ann Crotsley
Erika Ann Crotsley

Acceptances may be mailed to:

Lightner Law Offices, P.C.
4652 Hamilton Boulevard
Allentown, PA 18103

PAYMENTS TO THE STANDING CHAPTER 13 TRUSTEE
SHOULD BE MADE PAYABLE AND MAILED AS FOLLOWS:

Frederick L. Reigle, Trustee
P.O. Box 680
Memphis, TN 38101-0680